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Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

RE: MB DOCKET NO. 04-233 – Broadcast Localism

Dear Commissioners:

The Commission appears to want to increase localism and local broadcasting, which I endorse, however some of the proposed rules will actually inhibit, reduce, and even remove local broadcasting.

While the Commission continually attempts to support and address small local broadcasters, it does not address the truly small and rural broadcaster's issues enough. I'm talking about markets that are under 250 or no defined market at all.

A directive to staff overnights at small stations like ours in a rural area will certainly force us to go off the air overnights. No local forecast, no chance of EAS messages to be relayed, no local news, no national news. That would force listeners to seek out regional stations that serve their heavily populated home-bases, but have no knowledge of the truly local markets (towns) served by small broadcasters. That move would further erode local stations' listener base and the ability of local broadcasters to afford the ever-increasing expenses involved in broadcasting.

Small, independently owned broadcasters do not have the ability of using revenue from corporate media outlets in cities to help finance the operations of local radio stations. Our revenue comes from the local hardware store, the local clothing shop, furniture store, etc. When our expenses go up, it impacts the expenses of local small-town businesses and creates a hardship for both small broadcasters and retailers, alike.

I urge the Commission to be aware of initiatives that have a negative financial impact on small, rural broadcasters, and to reject the overnight staffing initiative.

Sincerely,

Bruce James
President